

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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DR. MILTON PRYSTOWSKY, in his own right  
and as EXECUTOR OR THE ESTATE OF ROSE  
PRYSTOWSKY,

**Civil Action No.  
2:07-cv-00072-SDW-MCA**

Plaintiff,

v.

TGC STORES, INC., ADT SECURITY  
SERVICES, INC., INVACARE CORPORATION,  
GOLDEN BROTHERS, INC. d/b/a GOLDEN  
TECHNOLOGIES, PRIDE MOBILITY  
PRODUCTS CORP. and JOHN DOES 4 – 10

**NOTICE OF MOTION FOR  
28 U.S.C. §1292(b)  
CERTIFICATION AND  
STAY OF PROCEEDINGS**

Defendants.

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PRIDE MOBILITY PRODUCTS CORP.

Third-Party Plaintiff,

v.

DEWERT MOTORIZED SYSTEMS, PHOENIX  
MECANO, INC. and KINGSTEC INDUSTRIES,  
INC., and JOHN DOES 1 – 10

Third-Party Defendants.

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**PLEASE TAKE NOTICE** that, on May 16, 2011, or as soon as counsel  
may be heard, defendant/third-party plaintiff Pride Mobility Products Corp.  
("Pride") shall move this Court before the Honorable Susan D. Wigenton at the  
United States District Court for the District of New Jersey, located at 50 Walnut  
Street, Newark, New Jersey 07101, for an Order certifying the March 23, 2011  
Order and record for interlocutory appeal pursuant to 28 U.S.C. 1292(b) and

staying this action until resolution of that appeal.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Pride will rely upon the accompanying Memorandum of Law, and all exhibits thereto, and any additional submissions made hereafter.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is also submitted herewith.

Dated: April 15, 2011

**MIRANDA SAMBURSKY SLONE  
SKLARIN VERVENIOTIS LLP**  
Attorneys for Defendant  
**PRIDE MOBILITY PRODUCTS CORP.**

**s/ Neil L. Sambursky**

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Neil L. Sambursky (NLS-8520)  
240 Mineola Boulevard  
Mineola, New York 11501  
(516) 741-7676  
Our File No.: 09-018

TO:

Deborah A. Crinigan, Esq.  
White & Williams, Esqs.  
1800 One Liberty Place  
1650 Market Street  
Philadelphia, PA 19020  
(856) 317-3600  
**Attorneys For Plaintiffs**

Charles C. Eblen, Esq.  
Emily Sullivan, Esq.  
Shook, Hardy & Bacon LLP  
2555 Grand Blvd.  
Kansas City, MO 64108  
**Attorneys For Defendant, ADT Security Services, Inc.**

Charles L. Simmons Jr., P.C.  
Michael R. Naccarato, Esq.  
GORMAN & WILLIAMS  
Charles Center South, Suite 900  
36 South Charles Street  
Baltimore, Maryland 21201-3114  
**Attorneys Third-Party Defendant, Phoenix Mecano and Dewert Motorized Systems**